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THE CITY OF NEW YORK
LAW DEPARTMENT
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Sched. 6 approved

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Conference is scheduled for 4/14/16 @ 11:00 am

March 16, 2016

SO ORDERED:
Date: *3/17/16* *Richard M. Berman*
Richard M. Berman, U.S.D.J.

BY ECF

Hon. Richard M. Berman
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: Dana Grottano, et al. v. City of New York, et al., 15-CV-9242 (RMB)

Your Honor:

We write in order to set forth the parties' proposed schedule for class discovery. At this time, the parties have agreed as follows, subject to Your Honor's approval:

- On or before March 21, 2016, the City will serve responses and objections to plaintiffs' three separate document requests.
- On or before March 31, 2016, the City will produce documents responsive to the foregoing requests.
- On or before April 7, 2016, the parties will confer regarding plaintiffs' Rule 30(b)(6) and 30(b)(1) deposition notices.

In light of the foregoing, the parties request that the conference now scheduled for March 22, 2016, be adjourned to a date after April 14, 2016.

Respectfully submitted,

/s/
Arthur G. Larkin
Assistant Corporation Counsel

cc: All counsel (by ECF)